

noveon

Noveon, Inc.
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Cleveland, Ohio 44141-3247
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Vice President
Health, Safety & Environmental
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March 8, 2004

Mr. Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Attn: Chemical Right-to-Know Program Commitment Change

Dear Mr. Leavitt:

Noveon, Inc. (Noveon) is withdrawing its support for CAS# 20592-85-2, phosphonic acid, [nitrilotris(methylene)]tri, sodium salt, which is part of the ACC Phosphonic Acid Compounds Panel and which is being sponsored under the International Council of Chemical Associations (ICCA). Noveon, Inc. has discontinued the manufacture of this chemical.

Noveon will continue to support the other chemicals that it sponsoring under the EPA HPV Challenge Program as noted in the May 29, 2001 letter to Ms. Christine Todd Whitman.

Sincerely,

Kenneth J. Willings
V.P. Health, Safety & Environmental

CC: John DiLoreto, ACC Phosphonic Acid Compounds Panel
Robert K. Hinderer, Ph.D.